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8 IN THE UNITED STATES DISTRICT COURT
9
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,) No. CR-10-0607 JSW
12)
12 Plaintiff,) **STIPULATION AND [PROPOSED]**
13) **ORDER CONTINUING DETENTION**
13) **HEARING**
14)
14 vs.) **Current Hearing Date: Sept. 22, 2010**
15) Time: 9:30 AM
15 SHELLY JONES,) Judge: Hon. Bernard Zimmerman
16)
16 Defendant.) **Proposed Hearing Date: Sept. 29, 2010**
17) Time: 9:30 AM
17) Judge: Hon. Bernard Zimmerman
18)

19 On September 17, 2010, the parties appeared before the Hon. Jeffrey S. White on the
20 government's motion to revoke Magistrate Judge Vadas's release order in the above-captioned
21 case. Judge White ordered additional conditions of release and affirmed the order of release,
22 subject to verification of the viability of the surety identified by Ms. Jones. Judge White ordered
23 Pretrial Services to conduct an inquiry into the solvency of said surety and to produce a report by
24 September 20, 2010. He also calendared the continued detention hearing for proceedings relating
25 to the surety to proceed before this Court on September 22, 2010.

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1 On September 20, 2010, Pretrial Services produced a report indicating that the
2 previously-identified surety does not have assets or a positive monthly cash flow. Pretrial
3 Services recommended Ms. Jones's release in the report, but only if the bond is signed by a
4 solvent surety. Ms. Jones does not concede that a surety must be solvent to sign an unsecured
5 bond. However, in an effort to resolve this issue, Ms. Jones seeks additional time to identify and
6 provide to the Pretrial Services Agency an additional surety or sureties. The parties have
7 discussed this matter, and jointly propose that this Court continue the matter for one week to
8 facilitate such efforts. The parties are also notifying Judge White of this development by way of
9 a Joint Status Report Regarding Detention that will be filed with Judge White concurrently with
10 this request.

11 Accordingly, the parties jointly request that the Court vacate the hearing currently
12 scheduled for Wednesday, September 22, 2010, at 9:30 AM, and add this matter to the Court's
13 calendar on Wednesday, September 29, 2010, at 9:30 AM. Counsel intend to submit any
14 briefing, if necessary, before the hearing but subsequent to any supplemental report from Pretrial
15 Services regarding additional sureties. Undersigned counsel for Ms. Jones discussed this matter
16 with Your Honor's Courtroom Deputy on September 20, 2010.

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18 IT IS SO STIPULATED.

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20 September 21, 2010
21 DATED

/s/
KATHRYN HAUN
Assistant United States Attorney

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23 September 21, 2010
24 DATED

/s/
LOREN STEWART
Attorney for Shelly Denise Jones

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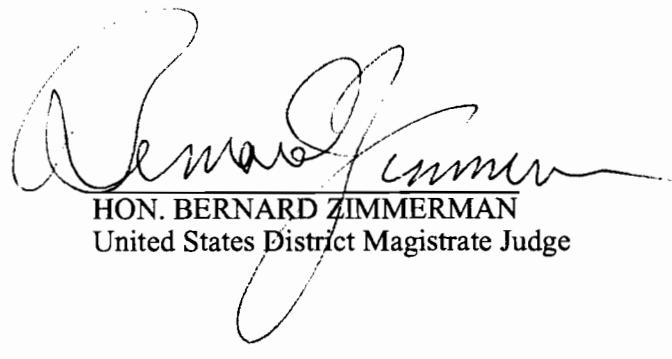
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1 
[PROPOSED] ORDER

2 For good cause shown, the continued detention hearing now scheduled for Wednesday,
3 September 22, 2010 is vacated. The matter shall be added to the Court's calendar on
4 Wednesday, September 29, 2010 at 9:30 AM.

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6 IT IS SO ORDERED.

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9 DATED

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11 HON. BERNARD ZIMMERMAN
12 United States District Magistrate Judge

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